

Compilation of Feedback on the Draft Charter and Work Group Recommendations

This document contains a compilation of the letters we received on the draft Charter and Work Group recommendations for the Puget Sound Coordinated Ecosystem Monitoring and Assessment Program developed by the Launch Committee. The letters were compiled from emails, Word documents and pdf documents and are listed in no particular order.

We received 23 letters from 22 organizations (listed below). Thank you to all who provided comments!

Sources

- Bellevue Utilities: Kit Paulsen
- Coastal Watershed Institute: Anne Shaffer
- Department of Ecology: Josh Baldi
- Department of Natural Resources: Kristin Swendall
- Environmental Protection Agency: Tony Olsen
- Green Crow Corp: Harry Bell
- Invasive Species Council (Recreation and Conservation Office): Wendy Brown
- King County: Joanna Richey
- Pacific Northwest National Laboratory: Ron Thom
- People for Puget Sound: Doug Myers
- Pete Haase, Citizen
- Puget Sound Partnership: Nathalie Hamel
- Navy, Marine Environmental Support Office: Robert Johnston
- Seattle Aquarium: Mark Plunkett
- City of Seattle Public Utilities: Jonathan Frodge and Susan Saffery
- Tulalip Tribes: Kit Rawson
- United States Geological Survey: Rick Dinicola
- University of Washington: Megan Dethier
- Washington Conservation Commission: Carol Smith
- Washington State University: John Stark
- Whidbey Action Area: Bill Blake, Alternate
- WRIA 9: Doug Osterman

Organization Type Breakdown

Action Area	1
Business	2
Citizen	1
City	2
County	1

Federal	3
NGO	3
State	6
Tribe	1
University	1
WRIA	1

A summary of the feedback we received can be found on the Puget Sound Partnership's website at: http://www.psp.wa.gov/MP_monitoring_program.php.

Thank you!

Subject: Re: Puget Sound Monitoring Program Seeking Your Feedback

Hi Nathalie,

Thank you for the opportunity to review the Puget Sound Monitoring Program Charter and Working Group Recommendations. Both documents were comprehensive and well-written. I only have a few suggestions to offer.

1) In the working group document on page 3 line 17, I recommend the wording be changed to: "the Stormwater Group fills a crucial gap in protecting Puget Sound **if the workgroup implements their strategy to address other land uses in addition to its current focus of municipal NPDES permits.**"

If they continue to focus solely on muni NPDES permits, the proposed crucial gap stated in this document will not be filled.

2) In the charter, page 7 lines 19-30, the role of the working groups should include the responsibility for assuring adequate data management for each project or program that contributes to the Puget Sound Monitoring Plan.

3) Similarly, the role of the Coordinating Committee (page 7, lines 39-3) should include the responsibility for assuring that adopted or common protocols and standards are used across workgroups. This committee should also be charged with reducing duplicity of monitoring efforts.

4) The table that begins on page 19 has "Technical Committee" as one of its columns. Should this be "Coordinating Committee"?

Thanks much,
Carol Smith

Carol Smith, Ph.D.
Salmon Habitat, Monitoring, and CREP Program Manager
Washington State Conservation Commission
360-790-7330

Subject: Comments on Monitoring Charter/Workgroups

Here are some random comments for consideration.

1. The Charter should say Charter and then state the Charter succinctly rather than have the outline of problem, background, etc. folded in.

That stuff could be in an appendix. Adaptive management and Open standards gibberish aren't part of a charter – are they? They are just the buzz words of the day and will be replaced soon by some other ones that more or less mean the same thing. I am not too sure what the exact Charter of this activity is from reading the many draft pages. I think it is in there, just not clearly stated right up front.

2. Clearly there is not intended to be a single, independent monitoring function that will

help define what is to be monitored and then collect standardized, pertinent data from responsible sources and provide a single source of reporting and analysis and possibly some “adaptive Management” recommendations. Instead, it’s going to be a large-group effort.

Too bad.

As a result we will continue to see tons of effort and money spent by every possible group and agency to collect and portray the data needed to perpetuate their existence.

Here is an example: The Department of Ecology does TMDL after TMDL. Here in Skagit County not a one of them has been seriously followed up with effective solutions so the problems remain and we need to keep having a Department of Ecology. The proposed structure will not prevent this and will mostly result in many more meetings and discussions and time. If Puget Sound is to be “cleaned” then an independent group of monitors must be in place to find the needed data, portray and present it professionally without bias, and provide recommendations if able. (I think that is how responsible financial monitoring is done.)

3. I think the work groups section is a good start and if the monitoring function was as described in #2 above, then pertinent, applicable business and process of the work groups (toward this end) would surface and they could focus on that.

4. I think a little group of wise people better figure out the few measures that will be regularly determined and publicized, else the public will just continue to roll their eyeballs.

An example – how about one or two measures that can be regularly publicized about the Salmon health. How long can money be thrown at the “problem” if we don’t see some practical and simple measure(s) of success? How many miles of riparian planting or how many acres of riverside property protected or how much LWD has been installed are not those kinds of measures. I sometimes ask our local salmon enhancement people if things are improving in this creek or that creek or ??? – are we seeing more salmon? Are we being successful? I don’t get much in the way of answer and I suspect because that way money will continue to come. I’m all for salmon enhancement but after 15 years folks – how are we doing????

Another example – I recently rode the ferry to and from Anacortes-Friday Harbor.

Beautiful! Relatively little development seen (from the boat) on the various islands. All that clean water and sea life. Looks about like it did 40 years ago. One sign on the ferry suggested a problem – it was about trash – showed some trash on a beach – and asked us to use the recycle facilities on the ferry. According to the Wash DOT, no big prob. with Puget Sound, and none of the people on the boat saw any either. What a missed opportunity to show the Puget Sound Health Scorecard and have some education.

Thanks for the opportunity – good luck.

Pete Haase

Citizen Volunteer for the cause!

Subject: FW: Comment letter

January 18, 2011

Nathalie Hamel
Puget Sound Partnership
326 East D Street
Tacoma, WA 98421

Dear Ms. Hamel,

Thank you for the opportunity to comment on the draft Charter for the Puget Sound Coordinated Ecosystem Monitoring and Assessment Program and Recommendations for establishing the Monitoring Program's Work Groups. WRIA 9 has done its best to pull together the following comments in the short timeframe that the Partnership has provided for commenting.

Major Points:

1. Focus on how to get reliable information on 'dashboard indicators' and explain how these data will be interpreted in policy and funding decisions (e.g, create an EPA-inspired "if, then...else/when" table to clarify this or a similar mockup of actual-decision making).

- a. Scope of effort to develop and coordinate a regional program for status and trends, program and project effectiveness, and cause-and-effect relationships is beyond even the PSP. Further, it has not been demonstrated that such a comprehensive program is needed (especially by monitoring entities).

2. Consider and explain when and where standardized protocols are appropriate.

- a. For example, research questions are not standardized. If multiple data sources are used to answer a particular research question, it is important that compatible or standardized methods are used to collect the data. However, standardization of the data collection methods, without consideration of the research questions, can greatly constrain the utility of the data. In other words, you can collect the data in a standard way but the results may be useless or inappropriate for answering your most pressing questions.

- b. Note that virtually all data management systems in existence (in Puget Sound) are intended for status and trends and ambient monitoring. These kinds of surveys are intended to address very broad questions at a fixed scale of inference. They are typically of limited value for effectiveness and validation monitoring.

3. Eliminate the steering committee.

- a. This level in the hierarchy appears largely redundant and may introduce substantial translation error as findings are passed from the technical/coordination committee to the science panel (in particular).

- b. Another concern is that the charter identifies three decision-making bodies. This

could be a recipe for failure. Pick one – like the Leadership Council.

4. Provide real incentives for work groups that recognize their mandate to prioritize institutional needs and their time limitations.

a. It must be acknowledged that the main function of this Program is to make it easier to do a regional assessment of conditions. In an ideal sense, all entities should care about regional trends. However, in reality, the implications for individual entities may be minor and not warrant a substantial contribution of time and resources.

5. Set product-focused goals for data management system

a. The charter calls for a unified information and data system to answer questions and support decision making at all scales. This is not possible or necessary. The primary goal should be to evaluate regional conditions (EG, 'Is the ecological health of the Puget Sound region getting better or worse?', which is the most pressing gap for the Partnership.

b. Note that all the specific program needs, mandates, and funding provisos for individual entities will remain top priority, even if the Program is instituted.

6. Specify vectors and venues for information flow

a. Explain why they will help to improve the flow of information by resolving current barriers to learning and understanding

7. Set realistic goals for reporting

a. Semi-annual or 5-yr reporting cycles might be feasible. Monthly reports are unrealistic

8. Set a clear and plausible plan for funding

a. This section of the charter is vague and obtuse, probably because there is no clear idea for how this effort will be funded. We need to recognize that funding is a primary constraint on the shape and feasibility of a regional monitoring program. The scope of the program has to be tailored to reflect a realistic funding scenario.

9. A very small number of work groups is better than the many work groups proposed to foster collaboration among related entities and functions and to minimize administrative costs.

a. How will NPDES requirements be incorporated into Freshwater/Riparian/Terrestrial?

b. How will impermeable surfaces within the 200-foot Shoreline Master Program regulated setbacks be addressed?

10. What can be afforded? The recommendations paint a picture of a huge, complicated, expensive, and top-down bureaucracy that the state and local governments

cannot possibly afford especially considering other top-down mandates that are not adequately funded and administered by the state.

Minor Points:

1. Goals: would be valuable throughout this section to introduce the basic plan for how these goals could be achieved, beyond the 'org chart'. Need some specifics.
2. Definitions:
 - a. Effectiveness monitoring can be done 'properly' with a variety of experimental designs, not just a BA (before-after). BACI and EPT designs are in some cases far more robust and also valid. Also the examples of ongoing effectiveness monitoring seems incomplete without mentioning studies being conducted by agencies and project sponsors.
 - b. Validation monitoring tests whether the hypothesized cause and effect relationship was correct (causation), not whether the management output created the intended outcome (correlation)

Again, this feedback was constrained by the quick turn-around provided to analyze the charter and work groups and comment on them. Please do not hesitate to contact me if you have any questions.

Sincerely,

Doug Osterman
Watershed Coordinator
206-296-8069 additional contact information
<<http://www.govlink.org/watersheds/9/contacts/default.aspx>>
Green/Duwamish and Central Puget Sound Watershed Salmon Habitat Recovery
(WRIA 9) <<http://www.govlink.org/watersheds/9/default.aspx>>
Working Together to Make Our Watershed Fit for a King!

Subject: Monitoring program comments

Nathalie,

I have gone over your Monitoring document and have a few editorial suggestions.

On page 8, line 21 you state that the Science Panel consists of 9 members. I believe the number is higher than that now that we have added Wayne Landis. I believe the number is now 10.

On page 11, line 28, change "implementing" to "implemented".

Nice job.

Regards,

John

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Subject: RE: Puget Sound Monitoring Program Seeking Your Feedback

Hi, Nathalie. Thanks very much for the opportunity to comment on the draft charter and work group recommendations. My comments are below:

In general, the ideas behind the charter make sense and seem quite comprehensive. I particularly think the goals listed are well-conceived and appropriate. My main concern is with the structure of the program, which appears to contain way too many layers of groups and process. I imagine that the program or subject experts would be in the coordination committee layer - as well as the science panel - so I don't know why there is a need to have so many other groups weighing in. I also thought that it would be the action agenda that sets the course for what needs to be monitored and guides the process, which also makes me wonder why there is a need for all groups to be so involved.

Workgroups - Given that invasive species in all ecosystem types was ranked as a high threat to Puget Sound recovery, I believe there needs to be an invasive species workgroup. With the work already conducted by the Washington Invasive Species Council to pull together a baseline look at existing invasive species data and information, the workgroup would be able to strategically build upon an effort that is already underway - which would include identifying new opportunities for monitoring where they currently do not exist and for species of highest priority to the Council, establishing standardized procedures for data collection, and joining to other regional monitoring efforts for invasive species.

With the strong assessment of risk identified by the Partnership, the existence of the Council's draft baseline assessment of invasive species data in Puget Sound, and direct impacts on salmon recovery and other habitat restoration efforts, it is very important to include invasive species monitoring in this effort.

Please let me know if I can of further assistance or if you have any questions about my comments. Good luck!

Wendy Brown
Invasive Species Council

From: Jonathan Frodge <jonathan.frodge@seattle.gov>

Date: Mon, 3 Jan 2011 16:25:06 -0800

To: Nathalie Hamel <nathalie.hamel@psp.wa.gov>

Subject: RE: Puget Sound Monitoring Program Seeking Your Feedback

Thank you and the committee for all of the hard work that evidently went into these draft documents. I think they adequately cover most of the topic we discussed in the Storm Water Work Group. I would be more explicit in two specific areas; In the problem statement it is mentioned that no single monitoring program offers an ecosystem wide view of the health of Puget Sound,. I would suggest that the Sound-wide program be specifically stated in the following 'Purpose' section and not inferred, as I perceive it to be in the current text. Second in the data management section, we need to develop and implement standard operating procedures, data quality objectives, and quality assurance plans. This should not be optional, these should be required by making them a requirement in the NPDES permits, otherwise it will be impossible to verify data comparability. Who will do the data management?

Thanks

Jonathan D Frodge, Ph.D.
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Subject: RE: Reminder: Puget Sound Monitoring Program Seeking Your Feedback

Happy new year Nathalie. I'm impressed with the documents to date and have no comment on them currently.

However - a couple points to make from the Aquarium:

1. We have a research component called SEARCCCH we'd like the monitoring program to be aware of. We would like our data/reports to be integrated with your efforts as well. Please see attached.
2. We have a monitoring/educational program called Citizen Science that we have data on for beaches. Attached is latest report.
3. We would like to continue to be a venue to showcase science and are an active member of such work with UW/COSEE and numerous NOAA projects. Please keep us in mind for hosting such events.

If you could forward this info to appropriate people so we could contribute our findings to the right person/database that would be much appreciated. Thank you.

Mark Plunkett, Seattle Aquarium Conservation Curator
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www.seattleaquarium.org
"Inspiring conservation of our marine environment"

Subject: RE: Reminder: Puget Sound Monitoring Program Seeking Your Feedback

Nathalie - forgot to mention The Seattle Aquarium has hosted bi-annual workshops for sea otter and shark research for over 15 yrs. (One year it's otters and the next sharks.) This draws international participation and should be brought to the attention of monitoring Program as well. The contact for these efforts (and SEARCCH) is Dr. Shawn Larson at s.larson@seattleaquarium.org and 206-386-4362.

Mark Plunkett, Seattle Aquarium Conservation Curator

Subject: RE: Reminder: Puget Sound Monitoring Program Seeking Your Feedback

Thank Nathalie. To best incorporate the field conservation data of Seattle Aquarium, Point Defiance Zoo and Aquarium and Vancouver Aquarium into PSP, I suggest the following short additions to the charter:

WORK GROUPS - Composition (line 14) add "...zoos/aquariums"
MONITORING ENTITIES – Composition (line 5) "...zoos/aquariums"

Best regards, MP
Mark Plunkett, Seattle Aquarium Conservation Curator

Subject: Re: Reminder: Puget Sound Monitoring Program Seeking Your Feedback

Nathalie- I did look this over, but found nothing in particular to comment on -- I guess PSP is getting closer to something concrete, with you on-board, but until we can get to specifics about Who is monitoring What and How, ie get beyond these well-intentioned generalities, I don't think I have much to offer.

Megan Dethier
University of Washington

Subject: Review of Charter Monitoring Program

Hi, thanks for the opportunity to take a look at the draft Charter. Here are my answers to your questions:

Charter Overview ?s

1. Does the draft Charter provide a foundation so that the Steering Committee, once formed, can begin developing a detailed work plan?

Yes, and I would encourage keeping the ability to participate in the effort more general as to not limit the ability for interested parties to participate early on.

2. Are there any significant gaps in the Purpose, Goals and Roles and Responsibilities sections?

I see limited mention of the role of watershed groups where many of the local monitoring efforts are being funded and coordinated at technical and policy levels. Suggest bolstering that continued watershed group relationship if that is what the Partnership desires.

3. Are elements missing in the Charter that need to be added or addressed?

It seems that the human well being section is more about “social and cultural” but lacks anything on the biological needs and carrying capacity. To truly understand the relationship about the fish and wildlife population carrying capacity it only seems logical there should be a simultaneous assessment of the human carrying capacity condition.

4. Are there ambiguities in any of the sections that need to be clarified?

There are many monitoring efforts associated with wastewater plants, industry, agriculture, K – 12 school programs, etc. I don’t see a connection with those efforts identified in the documents. I think it would be a good idea to solidify those relationships in the charter so we maximize efforts and bring those efforts together in a cooperative manner.

Work Group ?s

1. Are there missing criteria or have we included criteria that are not essential for identifying topics for work groups? What are your suggestions for improving the criteria.

I see low flows are mentioned but not peak flows. Increasing peak flows are an equal problem for both fish and human populations.

I think the assessment of human well being needs more definition, and should be targeted to human biological needs as they are shared with the fish and wildlife capacity needs.

2. Do you agree with the recommended topics for Work Groups?

It seems that we have been measuring many of the topics for some time. Since we have both success and failures in changing some of the targeted topics, and this is an “adaptive management” process, how do we change what we do with the information on an important topic? I think the working groups would be key in identifying the actions needed to address the results of the monitoring efforts. If they think about how the data will be used to change, it may change how it is collected and presented.

3. What topics need more urgent attention, and why?

I have mentioned it above but I think to ignore the human carrying capacity needs or impacts such as water, sanitary sewer, food, wood products, air pollution links will prevent us from developing achievable goals. I realize that many would like to prevent increased human populations in Puget Sound but that is unrealistic, and we should be accounting for the impact to the resource.

Thanks for the opportunity to comment
Bill Blake
Alternate Whidbey Action Area

Comments from the Marine Sciences Laboratory (MSL), Pacific Northwest National Laboratory, Sequim, WA

17 January 2011

Contact at MSL: Ronald Thom (ron.thom@pnl.gov; 360-681-3657)

Below are response comments from some of the scientific staff at MSL on the two draft documents from the Puget Sound Partnership:

- *A draft Charter for the Puget Sound Coordinated Ecosystem Monitoring and Assessment Program (Monitoring Program), and*
- *Recommendations for establishing the Monitoring Program's Work Groups.*

These documents are well prepared and comprehensive. We commend the PSP and staff for their work in drafting them. We agree with the use of the monitoring to make decisions in an adaptive management framework. Our comments and recommendations are summarized here. The PSP draft documents address many of our basic comments below. We state them here to emphasize their importance to a successful program.

Develop a clear set of decisions and decision-makers. It was not clear who would make the decisions, what the decision types might be, and what the process was for making decisions. We assume that this aspect is being worked out separately.

Articulate use of the data. Is this basically status and trends monitoring or does it involve action effectiveness monitoring also? Make sure that the monitoring design incorporates the questions being addressed.

Develop central guiding questions for the monitoring program. To be most effective, the monitoring program must be designed and run with a central set of guiding questions. Some basic questions that might be applied are:

- Has the Sound ecosystem health gotten worse, stayed the same or improved?
- Why has the ecosystem health gotten worse?
- Where have the changes been most evident?
- What can be done to improve conditions?

Integrate the monitoring program. To answer these questions, monitoring needs to be highly integrated. Connection between actions and biological response needs to be clearly articulated, even if only in hypothesis form, so that science can measure the appropriate variables and inform the collective decision-making process. Our sense was that the responsibility for monitoring will be broken up into myriad groups and may suffer from lack or weak integration. If for example, eelgrass shows a decline in Hood Canal, what other information can be used to explain this change? In this example, concordant sampling (at the appropriate scale and replication) of eelgrass and water properties that affect eelgrass including light, temperature, salinity, nutrients, and wave energy would be highly helpful in explaining the changes. As is now done, data on water properties collected in the middle of Puget Sound will have very little relevance to eelgrass. Data collected very close to where

eelgrass is monitored will have a much better chance of reflecting conditions experienced by eelgrass.

Develop working conceptual models. We recommend that for each metric that is monitored (Dashboard indicator) that there needs to be a simple conceptual model of the factors that directly 'control' that metric. Use this model to select the factors to be monitored. The models can be improved through monitoring and uncertainties research.

Develop numerical predictive models. Adaptive management (AM) requires models to forecast the effects of decisions based on a suite of actions. Develop a numerical predictive model for each metric (or a set of metrics as appropriate). Verify models with field data. Use monitoring data to calibrate the model, and to improve the model forecasts. Use the model to help make decisions that drive actions to improve the health of the ecosystem.

Consider *extensive* and *intensive* monitoring. Extensive monitoring is collection of a data on a few metrics over the entire Sound. Intensive monitoring, involves collection of a lot of data on more metrics within a small subarea of Puget Sound. Both strategies are useful. Intensively monitored bays, for example, can provide high-resolution answers to the relationships between variables. This is useful in calibrating and tuning numerical models.

Develop a program to resolve scientific uncertainties. Uncertainties research is required to investigate critical uncertainties that plague interpretation of the data and ultimately the confidence in decisions making.

Develop a schedule for the AM process. Ideally, the AM cycle should be annual. This means that data needs to be collected, analyzed, summarized, models need to be run to evaluate effects of alternative actions all within a 12 month period. Having multiple groups may hinder this schedule. A highly efficient and coordinated program is required to assure that this happens.

Develop an integrated data base management system. Design this system to be relatively easy to input data, query the data and output data to those in need of it.

January 17, 2011

To: Launch Committee for the Puget Sound Coordinated Ecosystem Monitoring and Assessment Program

Subject: Puget Sound Partnership Feedback on Draft Charter for the Puget Sound Coordinated Ecosystem Monitoring and Assessment Program and Recommendations for establishing Work Groups

Thank you for the opportunity to offer feedback on the draft Charter and recommendation for Work Groups. The Puget Sound Partnership recognizes the critical importance of the monitoring program to the success of the overall efforts to restore Puget Sound and we will continue to support the development of the program. We are very pleased with the progress made by the Launch Committee outlining in more detail the purpose, structure and assignment of roles and responsibilities for a multi-stakeholder program and believe the work accomplished thus far will help us move forward with implementing the program and ultimately, achieving our mission.

The feedback below was compiled from the suggestions and comments offered by selected staff in the Puget Sound Partnership, but does not necessarily comprise the official Puget Sound Partnership position.

General Feedback:

1. We need to tighten up language that describes the relationship between the Program with the Salmon Recovery Adaptive Management and Monitoring information and work. One fundamental point is that PSP is the state agency charged with implementing the Puget Sound Salmon Recovery Plan. This is a unique responsibility among all the other topics for Puget Sound recovery – PSP is charged with managing the recovery work for Puget Sound while charged with implementing recovery for salmon.
2. We need a definitive statement on who is making decisions on what type of information and for what purpose – who defines the questions from which the monitoring priorities are identified?
3. What is the role of the Open Standards process in this program? [this isn't the program's question to answer but seems to need to be answered]
4. Where (or is there a placeholder) do you assess existing monitoring to know whether or not this information informs recovery actions? This is related to 'B' above.
5. What is the hook for entities/agencies to participate in the Program?
6. Does the Program look at monitoring information associated with threats/pressures?
7. What is the role of the Dashboard Indicators vs. other information tracking recovery?

8. Unclear about the reasons why topical work groups are divided as they are – seems to need more explanation.
9. The Monitoring Program should generally serve as a ‘watering hole’ of sorts for the Monitoring Entities’ leaders, where monitoring organizations regardless of their size and relative clout can present their findings, learn from each other, share best practices, call for further research, discuss their common concerns, prioritize their collective work, and generally speaking inform both the Partnership’s leaders and their own organizational leaders with the purpose of improving Puget Sound ecosystem-focused decision making overall (management with facts).
10. In this context, like with the new ‘Working Group’ concept that the Monitoring Program Launch Team has been developing, there seems to be a need to focus on some of the more recent, many times overlapping details that have been evolving, such as relates to the **Lead Organizations** (LOs), the semi-annual **FEATS reporting** being required by EPA for all EPA-funded entities (many of which are Monitoring Entities), the **Indicator Champions** role (many of whom work for the Monitoring Entities), the **Interdisciplinary Teams** emerging from Open Standards (the Team Members from which are staff of the Monitoring Entities), **Local Integrating Organizations** (LIOs) that will serve as our link to the local data and the stories surrounding the associated local scene, and the like. These seemingly elusive system improvements (and the other, various unknown future developments like them that will surely develop going forward) are potentially real and most powerful leverage points that the Monitoring Program should be taking into consideration. Suffice it to say that there is a need for agility in how the Monitoring Program defines itself and operates over time. Adaptive management in how the Monitoring Program is structured and improved based on what we learn is the key.
11. If an organization becomes a Monitoring Entity, and does so well as hopefully defined by the Monitoring Program, that organization deserves to be recognized as such (over other organizations that indeed don’t). The Partnership’s Partner Program comes to mind in this context. As such, it is critical that the Monitoring Program identify the criteria for high performance in monitoring, help organizations to successfully reach those heights, and do so systematically, so that there is justice in which monitoring programs excel, are celebrated, receive better funding (or are cut in funding), and even potentially caused to drop off the vine as need be.

Feedback on Specific Components of Charter:

- 1) Problem Statement: add in information about why the lack of a coordinated approach is a problem: problem is that there is a lack of coordinated structure to support common management decisions and identification of common questions to answer from monitoring information.
- 2) Purpose Statement: add in more specifics about the purpose. Add in statement about the program supporting salmon recovery implementation as well as ecosystem recovery.

- 3) Background:
 - a) page 4, lines 8-9: the language here is, “should be considered as building blocks...”. My suggestion is that this is less about building blocks and more about linking one to another. Each monitoring program fills a role and the Program is the overarching framework w/in which to nest the specifically-focused program.
 - b) Add in language about the role of salmon recovery information (e.g. the monitoring and adaptive management plans being developed across the region for salmon recovery will identify a suite of priority monitoring needs – both questions to answer and monitoring needs to fund – these will be nested within the overarching work of ecosystem recovery monitoring to identify funding and options for common monitoring needs).
- 4) Goals:
 - a) Perhaps strengthen the goal around providing useful information that is linked to policy decisions.
 - b) Is there any type of benchmarks or ways of knowing if you are successful?
- 5) Roles and Responsibilities:
 - a) Suggest that you push for a decision on who is making the decisions!
 - b) Suggest that there is a clear element to the program that links information to decision makers in federal, state agencies.
 - c) Monitoring entities: are there representatives of these entities in the Program’s structure?
 - d) Work Groups: who works on protocols?
- 6) Reporting and Communication:
 - a) What are the key management decisions that the Program will focus on?
 - b) Peer review:
 - i) pg 12, line 29 – are these the hypotheses?/linked to Open Standards?
 - ii) Will there be peer review of protocols?
- 7) QA/QC: why are the ‘Stormwater WG and US EPA 2008’ called out? (explain)
- 8) Dashboard Indicators (page 14, lines 8-16). Recommend referring to them as The Puget Sound Dashboard of Ecosystem Indicators (current name on our website). Also, you might want to put them in the same order as they are listed on the website.
- 9) Definitions (page 16, lines 6-7 and 12-13). These two links weren't working, although the site is active.

Roles and Responsibilities in Appendix

- 1) Row # 1: Who makes the decision on who asks questions vs. who decides on how to answer questions vs. who asks on answers to questions?
- 2) Row # 2: Seems like this can be a x-walk of what already exists and what is needed
- 3) Row 1 Steering Committee: Take in the policy and management needs, etc. in the last section. This is where the structure seems to create another layer in the PSP. I think that this is a staff function to bring it to the SP and the Steering Committee in some digested way.
- 4) Row 3. ECB. The ECB may not want to get into this level of detail. The concept of a cross-PSP group might be more helpful so that the ECB is not opining without a science voice in the

room. What is presented is ok, but a subset of the ECB in a sub-committee of Cross-PSP group might be more functional and realistic.

- 5) Row 4. ECB and LC. Minor comment. Make the ECB give input to the LC on a parallel item.
- 6) Row 6. Advocate is probably correct, but likely another word is needed.
- 7) Row 8. SP, ECB and LC roles related to reports vary. Be more broad or be more specific.
 - SP. Review and endorse seems correct.
 - ECB. Add “as appropriate” to the comment on reports paragraph. Sometimes they don’t have a role.
 - LC. They approve some reports including State of the Sound. Add that in.
- 8) Row 9. Staff. Add that they make the recommendation to the SP and the Steering Committee.
- 9) Page 6. Structure diagram. I think that the Steering Committee should work through the Science Panel. The structure proposed creates another layer within the PSP for gathering and sifting information. It may be that they have consultation with the LC and ECB but this should be done under the umbrella of the Science Panel since this is primarily a science function.
- 10) Page 8. The description of the ECB needs to be revised. See the Action Agenda Appendix A and discuss any modifications since with our Director of Programs. They are not the eyes and ears on citizen concerns. They could provide the outreach and education function.
- 11) Page 8, line 36. To key decisions, add “related to policy and performance” to the end of the sentence.
- 12) Page 9. Line 9 paragraph. Add Planning and Policy Director and Director of Programs.
- 13) Page 10, line 38. The discussion about reporting and communications is not entirely clear to me. I don’t disagree with the description, but it is not really the role of the monitoring program to be communicating the results. The program would heavily influence the content, but the creativity and communication vehicles might be driven by others. In my experience, scientists and others often want to be opine about communications means and ideas rather than focusing on the specific expertise and contributions they need to make. Rewording to say closely coordinate communication, etc. with PSP to ensure that messages are accurate, etc. would be better IMO.
- 14) Page 11, line 17. I don’t think that this is their job alone per my other comment above. They contribute but maybe not lead.
- 15) Page 11, line 34. Add the Action Agenda to the list.

Specific Feedback on Topical Work Groups

- 1) Generally:
 - a) Seems like there is a catering of information towards the dashboard indicators – is this correct? And, if so, why? What is the assumed role and has there been/will there be a discussion about this?
 - b) Flesh out role of work groups with the responsible entities for management decisions (e.g. for salmon – co-managers + NOAA + PSP; or stormwater – ECY + local governments)

- 2) Salmonids work group: need further discussion on this being a 'work group' since this is a responsibility for PSP.



King County

Water and Land Resources Division

Department of Natural Resources and Parks

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January 18, 2011

Nathalie Hamel
Monitoring Program Manager
Puget Sound Partnership
326 East D Street
Tacoma, WA 98421

RE: Puget Sound Coordinated Ecosystem Monitoring and Assessment Program Draft
Charter and Recommendations for Topical Work Groups

Dear Ms. Hamel:

King County has long been an advocate for, and continues to strongly support, coordinated ecosystem monitoring for the Puget Sound region. We have participated in various past and ongoing monitoring coordination efforts, and look forward to ongoing collaboration into the future. King County is pleased to support the Puget Sound Partnership's goals of establishing the Puget Sound Coordinated Ecosystem Monitoring and Assessment Program by providing review of the Launch Committee's processes and continuing to fund Jim Simmonds' time to serve on the Launch Committee and the Stormwater Work Group. We expect to fund other staff time on other coordination groups including marine water quality monitoring, habitat monitoring and data management.

However, we are concerned that the proposal as currently constituted with multiple coordination and topic specific groups cannot be supported and funded by public and private agencies given the current economic conditions. While the goals of inclusivity are worthy in today's world of diminishing resources, we caution against profligation of committees and recommend streamlining and focusing our limited resources. We make several recommendations to this effect.

We are also concerned about the lack of acknowledgement of independent authorities and decision making processes of organizations that conduct monitoring that are not state agencies, such as local governments and business entities. Much of the monitoring conducted by these organizations is required by permit or legal mandate and thus not directly overseen by the proposed structure. Monitoring done by these organizations beyond that required by mandate or permit is typically undertaken to fulfill direct information needs. King County supports enhanced coordination of all the monitoring programs in a manner that acknowledges these separate authorities and decision making processes, but cannot support the creation of a single

management structure to oversee all monitoring programs. Again, this letter includes specific recommendations to change the charter to recognize these realities.

King County has reviewed the Draft Charter for the Puget Sound Coordinated Ecosystem Monitoring and Assessment Program, and also the recommendations for topical work groups from the Launch Committee. We recognize that this draft charter and the accompanying work group recommendations are attempting to achieve a complex set of objectives, and that much detail remains to be developed after the Steering Committee is established. We recognize that these details will be established later and although we look forward to continued participation and involvement, we want to recommend greater attentiveness to efficient use of resources.

With these primary concerns in mind, our responses to the questions you asked regarding the charter are below.

1. Does the draft Charter provide a foundation so that the Steering Committee, once formed, can begin developing a detailed work plan?
 - Yes, we believe that the draft Charter provides a foundation for developing a detailed work plan.
 - We encourage the monitoring program to build on existing successes in an incremental manner and work to define a more streamlined representative involvement of key stakeholders.
2. Are there any significant gaps in the Purpose, Goals and Roles and Responsibility sections?
 - We believe that one of the purposes of the monitoring program is to inform day-to-day management decisions and actions to protect public health and safety, such as swimming beach closures, shellfish bed closures, and flood warnings. We recommend that this need be explicitly articulated in the purpose statement.
 - We recommend that standardized protocols be developed only when appropriate and implemented with great care. There are examples of study designs that require unique protocols to achieve their specific objectives.
 - We recommend adding a new subgoal to goal #4 about communication. We believe that an important communication activity is to facilitate and fund a biennial regional conference to report research and/or monitoring findings. We believe that such a regular conference can reduce the need for redundant committees.
3. Are elements missing in the Charter that need to be added or addressed?
 - The structure recommended requires a large time commitment from multiple organizations, from multiple levels of management. This time commitment represents a substantial investment in the ecosystem monitoring program, on top of the investment in the direct collection of monitoring data. We encourage the Partnership and the Launch Committee to strive to streamline the proposed processes to ensure that the

costs are affordable and sustainable by all participants, who increasingly have limited capacity for such endeavors. Towards this end, we recommend that the functions of the proposed coordination committee be assumed by the steering committee and the coordination committee be eliminated.

- There are many ongoing monitoring coordination efforts in the Puget Sound region. Continuation of all of these efforts is not possible given today's diminishing resources. While some of these efforts likely will continue within this proposed structure (like the Stormwater Work Group), some, like the Puget Sound Ambient Monitoring Program (PSAMP) Steering Committee, will (and should) sunset. We recommend that the Launch Committee clearly articulate in their recommendations which groups of the existing group/committees will sunset and which will continue, with an aim towards decreasing the number of monitoring coordination groups/committees.
- We recommend explicitly acknowledging that monitoring priorities will evolve over time, and that the program be required to be flexible enough to enable these shifts to occur.

4. Are there ambiguities in any section that need to be clarified?

- As presented, it is unclear whether the program is intended to coordinate multiple monitoring programs (King County supports this), or whether all monitoring programs are part of one coordinated program (King County cannot support this). This distinction is especially important to organizations that conduct monitoring that are not state agencies, such as King County. These organizations have separate authorities and decision making processes regarding monitoring, often derived from, and required by, state mandate or permits. We support the effective coordination of monitoring programs, as opposed to creation of a single management structure overseeing these monitoring programs. Such a simple system cannot replace existing authorities and cannot be financially sustained in addition to those required already.
- The proposed decision making process does not clearly acknowledge the separate authorities and processes of all the organizations that currently (often by legal mandate) conduct monitoring that are not state agencies, such as King County and other local governments as well as business entities. The charter as written appears focused on assigning responsibility for all monitoring to the Puget Sound Partnership and its management structure. This may or may not be appropriate for state agencies depending on how budget authority is assigned between agencies. However, the framework needs to acknowledge the responsibilities that other organizations have regarding monitoring, with a focus on ensuring that all monitoring is coordinated.
- We recommend edits to Figure 2, the program structure, to better reflect the role of the staff at the Puget Sound Partnership. The figure currently incorrectly implies that the Steering Committee reports to the Science Panel, partnership staff, and the Ecosystem Coordination Board. This implied relationship does not reflect the text of the proposed

charter. It is our understanding that Partnership staff are to work collaboratively with the Steering Committee, and each reports to the Science Panel and the Leadership Council, and informs the Ecosystem Coordination Board. This arrangement calls for a more parallel organization between Partnership staff and the Steering Committee in Figure 2, and for an informational line, as opposed to a reporting line, to the Ecosystem Coordination Board.

- We recommend that the definition of Effectiveness Monitoring be expanded to include other study designs, not just before-after monitoring.
- We recommend that the definition of Validation Monitoring be refined as a testing of the validity of whether the hypothesized cause and effect relationship was correct (causality) as opposed to whether the management output created the intended outcomes (correlation).
- The Role and Responsibility Table in Appendix 1 shows a “Technical Committee”. We believe this is intended to be the Coordination Committee, which as noted above could be eliminated and the Table revised accordingly.

Our responses to the questions you asked regarding the recommended work groups are described below.

1. Are there missing criteria or have we included criteria that are not essential for identifying topics for Work Groups? What are your suggestions for improving the criteria?

- No suggestions.

2. Do you agree with the recommended topics for the Work Groups?

- While we agree that there are “infinite ways” to organize these work group, we believe that the current recommendation for 10 work groups will be too expensive to staff, fund, and sustain either in the short or long-term. We recommend a more streamlined approach with fewer work groups with broader scopes. Towards that end, we make the following recommendations:
 - We recommend that the proposed Freshwater Quality and Streamflow Work Group be eliminated. All of the responsibilities of this group could be assigned to the Stormwater Work Group, except that the river flow responsibilities could be assigned to the Habitat Work Group.
 - We recommend combining the Freshwater, Riparian, and Terrestrial Habitats work group with the Marine Nearshore Habitats work group to form a comprehensive Habitats Work Group.
 - We recommend that the Birds and Mammals Work Group and the Marine Food Chains Work Group and Forage Fish Work Group be combined into one Species Work Group.

- We recommend that marine sediment quality be added to the Marine Water Quality Work Group.
 - We recommend that responsibility for coordinating the monitoring of toxics in marine fishes be transferred to the marine water quality work group from the Marine Food Chains and Forage Fish Work Group.
 - Reducing the numbers of work groups as recommended would result in seven work groups, Stormwater, Marine Water Quality, Salmonids, Habitats, Species, Human Dimensions, and Coordination of Data Management and Access. While different in composition, this organization also builds on the success of the San Francisco Estuary Institute and the Helsinki Commission's Baltic Marine Environment Protection Commission, which each have five work groups under a steering committee. We believe this organization is more sustainable and still meets the program needs. Ideally, over time the number of workgroups can be reduced even further. We recognize that there is overlap among many of the work groups on specific monitoring elements. We encourage peer-to-peer coordination to address this overlap. We believe this coordination will allow for the technical integration necessary to pull all the pieces together at a technical level, which we believe is required to help determine and prioritize monitoring needs.
3. What topics (those that are listed or other not included) need more urgent attention, and why?
- We recommend incorporating air quality into the monitoring program. We believe that monitoring for routine air quality parameters should be addressed by the Human Dimensions Work Group because of the direct link to human health. We also believe that deposition of contaminants from air to the landscape and waterbodies should be addressed by the Stormwater Work Group because of its link to water quality. There are currently several air quality monitoring efforts in the Puget Sound region that would likely benefit from increased coordination.
 - We recommend that an interlaboratory intercalibration study be conducted for the various marine monitoring programs. A pilot laboratory intercalibration study was conducted for stormwater monitoring in 2009. We believe a similar study is a high priority for marine water quality monitoring.

We wish to express our thanks and appreciation for the opportunity for this review. We strongly support the efforts of the Puget Sound Partnership to establish a coordinated ecosystem monitoring program for the Puget Sound region and we are committed to working with the Partnership and others to streamline the proposal into a viable and sustainable model.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joanna Richey".

Joanna Richey
Assistant Division Director

cc: Christie True, Director, Department of Natural Resources and Parks (DNRP)
Mark Isaacson, Division Director, Water and Land Resources Division (WLRD),
DNRP
Randy Shuman, Manager, Science and Technical Support Section, WLRD, DNRP
Jim Simmonds, Supervisor, Water Quality and Quantity Group, Science and Technical
Support Section, WLRD, DNRP
Curt Crawford, Manager, Stormwater Services Section, WLRD, DNRP
Wally Achuleta, Managing Engineer, Engineering Services Section, Road Services
Division, Department of Transportation
Harry Reinert, Special Projects Manager, Department of Developmental and
Environmental Services

Ms. Nathalie Hamel
Monitoring Program Manager
Puget Sound Partnership
326 East D Street
Tacoma, WA 98421

Dear Ms. Hamel:

We, as staff from the City of Seattle, are pleased to comment on the draft products of the Puget Sound Coordinated Ecosystem Monitoring and Assessment Program Launch Committee. We recognize the short time-frame that was available for developing the draft charter and the task assumed by the committee of describing essential components of the regional program that will support program participants' ability to generate the detailed functions and workplan.

We also appreciate the efforts of the Puget Sound Partnership (PSP) to include on the Launch Committee a range of participants from the different governmental agencies, tribes, and stakeholders in the process. Our first comment is to reaffirm our conviction that local participation - by agencies, Tribes, utilities, special districts, action area local integrating organizations and watershed scale groups (eg. WRIAs) that have a strong role in existing monitoring work - will be essential to the program's future success. Therefore, these local organizations need to have a stronger role than is laid out in this proposal. Some of us also consider the proposed structure to be a bit unwieldy and would suggest that you consider whether both a steering and a coordination committee are truly necessary; improved utilization of the existing Puget Sound Partnership committees could streamline and better integrate the monitoring effort.

Second, we would stress that the purpose of the monitoring program is to support decision making by various entities that administer resources and set priorities for Puget Sound restoration. We believe the charter could do more to indicate which decision makers and what type of decisions the program is intended to support. It is important to clearly define how the results of monitoring will be framed and delivered to the adaptive management process. Beyond defining an Open Standards approach, the Committee and Partnership need to articulate a common vision for what adaptive management means and how it will work in concert with monitoring and assessment.

Third, we acknowledge that there is a diversity of opinion in the region about the ultimate home for the monitoring program. We believe this diversity reflects a common desire for a high degree of confidence that judgements about the effectiveness and priority of various programs, actions, and resource allocations are made in a transparent and objective manner. We take no position at this time, but encourage the PSP to continue to facilitate the regional dialogue on this issue among governmental and community leaders. Considering resource limitations, we would encourage continued creative thinking as to

which functions may be best led by PSP, which by the workgroups, and which may be better accomplished through an independent natural and social science review function.

Fourth, as to the separate piece on workgroups, we feel the essential functions and roles of such workgroups is clearly described. We believe that a small number of groups is better, to foster collaboration among related entities and functions and to minimize administrative costs. We believe that the basic sources of interest and expertise for most of the workgroup topic areas exist already, so the task is to work collaboratively with existing groups, to commission and support them in taking up the work identified by the monitoring program. There needs to be a clear path for this work to feed into and influence higher-level policy and funding decisions.

In closing, we commend the progress of the Launch Committee thus far. This work is essential to assess our effectiveness and guide future actions. We encourage the PSP to resolve outstanding issues around governance and oversight and move this effort forward as soon as possible. Thank you again for the opportunity to comment.

Sincerely,

Susan Crowley Saffery
City of Seattle



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January 17, 2011

To: Nathalie Hamel
Monitoring Program Manager, Puget Sound Partnership, Tacoma, WA

From: Richard S. Dinicola
Associate Center Director, USGS WAWSC, Tacoma, WA

Subject: COMMENTS – Draft Charter for the Puget Sound Coordinated Ecosystem Monitoring and Assessment Program and Recommendations for establishing Work Groups

Thank you for the opportunity to review the subject materials. We recognize the importance of the monitoring program to the overall efforts to restore Puget Sound and share your commitment to using best available science to inform decision making. The comments below are offered by selected individuals in the Pacific Northwest Area of USGS.

With regard to the draft charter, we offer the following:

Overall the draft Charter provide a foundation so that the Steering Committee can begin developing a detailed work plan, recognizing that the process will need to be flexible and adaptable as it grows.

The only significant gap or missing element to consider is the relationship between this program and recently selected Lead Entities. Given that much or most of the technical work related to restoration will be going through the Lead Entities, it seems that a linkage to this monitoring program would be fruitful.

An ambiguity identified in the charter is that it is not clear whether or not the Partnership intends to directly fund monitoring activities (as in “boots and boats” type activities) through this program. It is not until near the end of the charter (under “Funding”) that a significant role of the Steering Committee is identified: “The Steering Committee will evaluate the needs and strategies for funding, and recommend how to distribute available funding.” Where will that available funding come from? Perhaps this is the place to describe the intended relationship with the Lead Entities.

With regard to the draft recommendation for Work Groups, we offer the following:

It seems beyond the scope of a launch committee to develop these recommendations in such detail. Perhaps the highest value of the comments you receive on this document is will be to provide the new Steering Committee a “straw man” to begin their work of identifying and commissioning Work Groups.

The final three criteria (p. 2, lines 29-33) seem most worthy of the efforts and expense that a Work Group will likely entail. These criteria represent challenging topics (like effectiveness monitoring) that are important and have yet to be addressed, or have the potential for substantial synergy and cost-savings through regional coordination. In addition, building on ongoing monitoring initiatives (lines 17-19) will be critical for showing progress and early success in the program. The criteria described in lines 26-28 are unclear, but it appears that the concept is captured well enough in the final bullet.

Consider that there may be monitoring needs that will not best be handled by a formal, chartered work group, or at least clarify that work groups may come in many forms and sizes. The existing Work Groups/committees you list (p. 2, lines 2-8) are all of substantial size and complexity. Many Dashboard Indicators will not require a Work Group similar in scope to these to meet their needs, because the Indicator is either a relatively straight-forward metric that can be readily compiled (percent of shoreline armored or commercial fisheries harvest, for example), or it relies on previously determined combined metrics (marine water or freshwater quality indexes, for example). Similarly, Dashboard Indicators that have high signal to noise data, have significant years of data, and are cost-effective to monitor may not get much added benefit from a Work Group type process.

The topics listed that should be considered for more urgent attention include:

Stormwater – Programmatically, it would be useful to leverage their success to date and help new Work Groups benefit from their lessons learned. Ecologically, the reduction of stormwater and associated contaminant loads is critical for subsequent reductions in toxics in sediments and fish, pathogens at beaches, etc. In addition a viable long-term funding mechanism for stormwater monitoring through permits appears eminent, and that will greatly facilitate their continued successes.

Salmonids – Potential for great benefits through coordination, and an effective way to get the tribes' collective expertise into the process.

Coordination of Data Management and Access—Get started (at a relatively low level) so the tools are available when needed. Stormwater data will likely be the first topic and they would benefit from early collaboration with that Work Group.

Nearshore Habitats—There are millions of dollars of nearshore habitat restoration projects underway and no clear monitoring program to prioritize projects or evaluate the cumulative effectiveness of these efforts.

Human Dimensions—Outside of the box for most scientists, so early work by this group could result in some interesting interactions with the ecosystem-centric groups

cc:

Center Director, USGS WAWSC, Tacoma, WA

Frank Shipley, USGS Pacific Northwest Area, Seattle WA

Dear Nathalie

1.6.11

I was a charter member of the Cooperative Monitoring Evaluation and Research (CMER) program when it started in the late 80's. Recall that CMER is the science element of the Adaptive Management Program in the Forest and Fish Habitat Conservation Plan. CMER has been and still is a very active and successful program that considers status and trend, validation and effectiveness monitoring on forestlands in the Puget Sound watershed.

The draft charter on page 5 line 8 should additionally refer to the Forest Practices Act that implements Forest & Fish Habitat Conservation Plan, CMER and Adaptive Management. Also, on page 14 line 24 the charter refers to the Forest and Fish Habitat Conservation Plan's effectiveness monitoring element. A similar reference should also be made under the status and trend and validation monitoring definitions—maybe with a more specific reference to CMER.

The draft workgroup document lists CMER as an existing workgroup but is silent to the fact that is currently addressing many of the recommended topics listed later in the documents. It is important for readers not familiar with of CMER to see a better presentation its scope of work.

Please consider these changes.

Thanks

Harry Bell
Chief Forester
Green Crow Corporation

January 17, 2011

From: Robert K. Johnston, PhD

To: Natathle Hammel

Subj: Comments on Draft Charter and Work Group Recommendations for Puget Sound Monitoring Program

Ref: (1)

http://www.psp.wa.gov/downloads/MP/DC_Files/Draft%20Charter%2012-28-10%20with%20Appendix.pdf

(2)

http://www.psp.wa.gov/downloads/MP/DC_Files/Draft%20Work%20Groups%2012-28-2010.pdf

Thank you for the opportunity to review the subject documents. The following comments are provided for your consideration.

Draft Charter

P1 L20 Problem Statement

Problem statement should include the following (or similar): Accurate, timely, and comprehensive monitoring data are absolutely critical for implementing an adaptive management program for Puget Sound protection and recovery as required by the enabling legislation.

P2 L19 “The Science Panel endorsed the use of the Open Standards...”

This is inaccurate, the Strategic Science Plan states: “The Science Panel has endorsed an adaptive management approach that will provide a credible means by which scientists can inform policymakers and policymakers can be accountable to the public for recovery results.”... “The Partnership has adopted a performance management system that fully supports adaptive management: the *Open Standards for the Practice of Conservation* (The Conservation Measures Partnership, 2007)” – Note that Open Standards is just one approach for implementing an adaptive management program.

P4 L22 “... monitoring and assessment of key indicators”

Should revise to read “monitoring and assessment of data need to support evaluations of key indicators”. It is unlikely, that the indicators themselves can be measured directly in all cases.

P6 Fig 2 Note there is no direct linkage between Science Panel and Ecosystem Coordination Board. This linkage is something that the Science Panel is trying to improve through the cross-partnership working groups and joint meetings.

P7 L21 “... and is [currently] composed of nine scientists”

P8 L22 “with independent scientific advice and peer review of the Action Agenda, Monitoring Program, and indicators.” Revise to:

“...with independent scientific advice on the Action Agenda, Monitoring Program, and indicators and [facilitate] peer review of [other science-related products].

P8 L29 “It is ultimately accountable for some of the program’s decisions.” Unclear, what does “some” mean?

“The Science Panel is ultimately accountable for assuring that there is a strong scientific basis for supporting program decisions”

P10 L4 Note that the Strategic Science Plan calls for establishing a data management work group

P12 L38 “Academy” – first time mentioned, not explained

Do you mean the Program Review to be conducted by the Washington State Academy of Sciences?

P12 L38 “Peer Reivew”?

Unclear if referring to whole program (Monitoring Program Review) or peer review of individual monitoring products. Probably need to distinguish between both types of review.

P12 L25 I’m not sure if every little piece needs to go through peer review, need to define monitoring products (final report) that would be subject to peer review. Or do you mean that the working groups themselves provided peer review?

P13 L1-10 Should include development of Data Quality Objectives and site guidance see

<http://www.epa.gov/osw/hazard/correctiveaction/resources/guidance/qa/epaqag4.pdf>

P13 L19 Funding

This section is vague and weak. At minimum the document should define who has responsibility for obtaining the funding needed to support the monitoring program. Federal, State, Local, and regulated entities...

P14 L4 “Action Plan” not defined, do you mean monitoring plan?

P14 L8 “Dashboard Indicators” gives list of current dashboard indicators, but needs a more generic definition, ie”

Dashboard indicators are a set of indicators chosen to serve as vital signs of the health of the Puget Sound. Currently, ...

P15 L1 quoted material should be enclosed within quotes

P16 L20 Validation (Cause and Effect) Monitoring

Cause and effect determination can only be accomplished by testing hypothesis in controlled experiments. Examples given could be the result of correlation between management action and response, not cause and effect (in the strictest sense).

Table 1 might be easier to read if presented in outline format

Step 6 – Science Panel role should be to document monitoring requirements in BSWP, not sure if “advocate” is appropriate

Step 8 – is this where the Science Panel would facilitate peer review of monitoring products and deliverables?

Comments on Draft Recommendations for Topical Work Groups for the Puget Sound Coordinated Ecosystem Monitoring and Assessment Program

Document should define and structure and function of the work group. How staffed? When and how often do they meet? What are the products and documentation? Who pays? Etc..

Might consider single working group with specific agenda topics (fresh water monitoring, marine monitoring, etc) as it is daunting to consider that all the groups listed are staffed and working independently. Should also consider regional or geographic considerations. For example, the jurisdictions, entities conducting monitoring, and monitoring questions may be different in South Sound than they are in the San Juan Islands.

**Tulalip Tribes comments on Draft Charter of the Puget Sound Coordinated Ecosystem
Monitoring and Assessment Program, Dec. 28, 2010 Draft**

January 17, 2011

Thank you for the opportunity to comment on the draft charter. This monitoring and assessment program will be critical not only for tracking early implementation of the Action Agenda but more importantly for supporting adaptive management of that agenda and all actions we are taking to restore the health of the Washington portion of the Salish Sea. The goal of the Tulalip Tribes is to see the Puget Sound basin restored to a level of function that will fully support the sustainability and utilization of all natural resources reserved to the tribes in the Stevens Treaties. We think that this goal is also shared by most people in the non-Indian community. Our comments are guided by this goal.

We reviewed the Draft Charter as well as the Draft Recommendations for Topical Work Groups. In general, both documents could benefit from drawing a stronger connection to the Action Agenda and the large amount of work that has already been done to implement monitoring and adaptive management within the context of the Action Agenda. Two examples of this kind of work are the partnership's accountability program and the Partnership's work with a subcommittee of the Recovery Implementation Technical Team (RITT) to develop a template for adaptive management plans for all 14 watershed salmon recovery plans. Many people throughout Puget Sound, including a number of staff at Tulalip Natural Resources have invested lots of time in these and similar efforts. We think it is important that this work be appropriately acknowledged and that future monitoring and adaptive management work within the Partnership build on the work that has already been done.

One challenge that the Partnership is well poised to meet is how to coordinate locally-based and watershed-based adaptive management plans to meet regional needs without losing the local knowledge and energy that maintain grassroots support for the Puget Sound recovery effort. A key role for the partnership is to reconcile the needs for local and regional focus, and we think that role should be emphasized in this charter. The Partnership is uniquely situated to, for example, be sure that restoration funds are distributed in the optimal way to restore all of Puget Sound, provide region-wide incentives to maintain working forests that will benefit all local areas, and set a region-wide vision for recovery that goes well beyond no net loss. The Partnership should be helping all local areas to collectively think about the value of ecosystem services and should be the forum for developing creative ways to assess the capacity of the system to provide these services now and develop region-wide solutions for enhancing the ability of the system to provide ecosystem services. We don't see these important issues addressed in this charter at all.

The biggest gap we see in this draft charter, though, is its failure to clearly articulate a vision for where Puget Sound recovery is headed. Currently local governments are making choices that assume that no net loss (NNL) of ecosystem function is the best we can do. The option to go beyond NNL is not even on the table, and therefore only the people benefiting by development are supported by the resources and the actions of local government. Because the vision of the

future is limited to the status quo, net gain is not possible because the existing targets are too low.

To us, the greatest potential of the Puget Sound Partnership is to add value to the mandates of existing agencies and organizations to move the region towards a vision of the future that represents a gain over the status quo. For us, this vision is a Puget Sound that produces the natural resources that were reserved by the tribes in the Stevens Treaties at sustainable and harvestable levels. If this vision were articulated up front in the charter then the rest of the program would follow logically. We would design a monitoring and assessment program to choose and measure those key variables that will indicate ecosystem health and the program would include measures to change actions that are preventing those variables from reaching the levels that indicate health. But without such a vision, it is difficult or impossible to design a coherent program. Therefore, we urge the Launch Committee to include in the final charter a coherent vision of a future that is better than what we have today.

The following are specific comments and suggestions for revisions in the two documents we reviewed.

Charter

p. 1/ line 20 ff Problem Statement. Rather than referring vaguely to the “Puget Sound Partnership’s need to understand ...”, this should at least cite specific mandates that the Partnership has. Ideally it would go beyond that and state a clear vision of a future that guides the monitoring and adaptive management plan.

p. 1/ line 29 ff Purpose. The Action Agenda is mentioned here but no other efforts, presumably being done under the auspices of the Action Agenda, are included. It is very important to explicitly make the links to those other efforts, and this section is the place to start doing that.

p. 3/lines 2-3 Figure 1 caption. Provide a reference to the source of this figure.

p. 3/lines 5-6 Rather than vaguely referring to the variety of monitoring programs that already exist, it would be more informative to explain that each of these has a purpose and describe how the Partnership’s monitoring and adaptive management program will add value by coordinating these towards a common vision of restoring Puget Sound so that it can support a variety of natural resources at sustainable and harvestable levels.

p. 4/line 27 The word “restoration” was changed to “recovery” in goal 1b. This is an improvement over the earlier version, but it is still important to clearly point out that protection of existing well-functioning habitat, along with monitoring of that habitat to assess the level of protection that is actually occurring, is critical to the success of the Partnership’s mission.

p. 5/lines 8 ff. The specific goals of HCPs and other management plans adopted under the ESA should be directly referenced here in goal 2c.

p. 5/lines 32-33 Goal 4b, or a new goal, should specifically state that one of the goals of this program is to track progress towards achieving the goals of the Action Agenda.

p. 6/fig. 2 This diagram shows a fairly complex structure, but all contained within the Puget Sound Partnership structure. The only way for this program to produce any results is if there are links to decision making bodies outside of the Partnership. Such links should be included in the program and shown in this diagram.

p. 7/lines 8-9 It is unclear how data from different entities will be used in this program. Our understanding from information presented elsewhere in the document is that the intent is to strategically select from what is already being collected and to develop new programs to collect what is needed and not currently being done. If that's the intent, say that here.

p. 7/lines 32 ff. The role of the Coordination Committee, and therefore whether or not it is necessary, is unclear from what is stated here. The steering committee appears to be sufficient to provide policy guidance. Is there a specific technical role for the Coordination Committee that is not being stated.

p. 7/line 40 The role of the Coordination Committee is "to coordinate". This is using the term being defined in its definition and therefore not providing any information about the role of the committee.

p. 8/lines 1-2 This seems to contradict the statement above that existing monitoring programs will provide the basis for this program. Also, the coordination committee recommends, who decides?

p. 8/lines 13-17 The role of the steering committee is unclear. Being accountable for some of the results, without saying which ones, greatly dilutes the accountability, doesn't it? Also, this does not say that the Steering Committee oversees the application of the monitoring results, which we feel is a key component of this program. If they don't oversee the application of the results, who does?

p. 8/line 27 Having the Science Committee accountable for some outcomes, without saying which ones, greatly reduces actual accountability. Also, having them accountable for anything is not consistent with an advisory role. Are you implying that they will be fired if they give the wrong advice?

p. 8/line 32 What exactly will the ECB advise the Leadership Council about relative to this program? The key point about the ECB is that it represents both the local action areas and region-wide interests. Thus, it is the link between the regional level and the local level. This should be clearly stated. This is a key issue for the monitoring program, and the role of the ECB in monitoring and adaptive management should be keyed to this.

p. 9/lines 4-7 This is a good statement of the role of the Leadership Council in monitoring. The other role statements should be revised to be as clear as this one.

p. 9/lines 29-30 Our state-tribal comanagement court orders specifically call for equal accessibility of data by all managers at the same cost. Possibly the concept of equal cost of data access should be added here.

p. 10/lines 38-39 Effective communication between science and policy is critical. However, it is important to keep in mind that science advises policy and policy makes decisions.

p. 12/lines 15 ff Peer Review. In an earlier draft this section listed three levels at which peer review is important, to which we would add review of the application of monitoring results. This list of four things added to the value of this section and should have been left in.

p. 12/line 26 We support the inclusion of the language “... the Steering Committee or an independent entity ...”

p. 12/ line 38 The reference to “the Academy” should be changed to “the Steering Committee or an independent entity”.

p. 13/lines 28-33 This lists specific duties for the work groups, the Coordinating Committee, and the Steering Committee. These duties should be included in the summaries of the duties and responsibilities of particular entities in an earlier section.

p. 14/line 8 We don’t see the Dashboard Indicators referenced elsewhere in the document except for some mentions of specific Dashboard indicators in the work group recommendations. The charter does not discuss the relationship of this monitoring program to the Dashboard Indicator effort. If there is, in fact, any relationship, that should be discussed. If there is no relationship, then there is no need to mention Dashboard Indicators in the glossary or in the work group recommendations.

p. 14/line 17 The word ‘effective’ is used in the definition of “effectiveness monitoring”. You should not use a term in the definition of that term.

p. 14/lines 23-28 The discussion of effectiveness monitoring examples is pretty long. Shouldn’t this discussion, or an expanded version of it that gets into the relationship between this program and the individual examples, be in the main body of the document and not relegated to the definitions?

p. 14/line 33 The concept of key ecological attributes does not seem to be used in the document, so why is it defined? Actually, if the document said more about the relationship of this program to the Partnership’s other programs, then the concept of KEAs would probably come up.

p. 14/line 40 Monitoring is the topic of the entire document. The entire document should serve as a definition of what monitoring means in this context. It is unclear why this needs to be in the definitions section.

p. 15/line 15 Open Standards does not appear to be discussed anywhere in the main document. It should be, as part of relating this program to the other work of the Partnership, and it should be clearly defined where it is used.

Appendix I. This is very helpful in terms of defining specific roles and responsibilities. It would be helpful if this were directly referenced in the main document. It would also be very helpful if these roles and responsibilities were explicitly tied to components of the Action Agenda.

Draft Recommendations for Topical Work Groups

In general, this list of tasks and topics is too general and vague to provide any guidance as to the establishment or functioning of work groups.

p. 1/lines 39-40 This sentence repeats the last sentence of the previous paragraph.

p. 2/line 1 This list of groups would be better presented as a table with authorities and roles and responsibilities listed. Also, it is not very comprehensive.

p. 2/line 3 What specifically is this referring to? The RITT, the Recovery Council, the watershed groups, or what?

p. 2/line 15 Dashboard indicators were not listed in the purpose section at the beginning of the document. We would caution against focusing on those as opposed to those indicators most likely to give a picture of the status of Action Agenda implementation. Dashboard Indicators were selected mainly for communication as opposed to assessment, right?

p. 2/line 21 Insert “at least” after “meets”

p. 2/line 22 Do you mean “ ... high signal to noise ratio”?

p. 2/line 27 It is unclear what “fits with” means. Also, there doesn’t appear to be any discussion of ecosystem components or threats in the main document. It seems that the open standards approach, including the conceptual model, the ecosystem components, the threats, and, importantly, the indicators developed through that process, should be the basis for the organization of this entire monitoring and adaptive management program. This structure would provide an automatic, and strong, linkage between this program and the other work the Partnership is doing.

p. 3/line 1 Work group topics should be closely linked with the Action Agenda.

p. 3/ line 11 Actually, the dashboard indicators have all been pretty well worked out. What we need is the set of appropriate indicators to use in an adaptive management program.

p. 3/lines 14-15 Not sure what “coordinated with habitat status” is referring to.

p. 3/lines 16-17 Only addresses a significant gap if this goes beyond monitoring dashboard indicators to selecting the appropriate indicators for adaptive management.

p. 3/line 28 The commercial harvest dashboard indicator goes way beyond just salmon, so it isn't clear why the salmonid group is responsible for this one. Also, why are these dashboard indicators the most important, or even important in any way, for salmon.

p. 3/line 31 For listed species should reference the adaptive management plans being developed under the recovery plans.

p. 3/lines 32-33 Yes, and the RITT and the watershed groups are working with the partnership to develop a framework to illustrate this coordination. Refer to that, please.

p. 3/line 37 Wow, the reference to HCPs is sure buried in here. HCPs consider effects on all listed species and not just salmon, right?

p. 3/line 38 Insofar as these affect listed salmon, the RITT is developing a complete framework for this, which, hopefully, will be incorporated into the PSP's accountability program.

p. 4/line 3 Same comment as for p.3/line 38

p. 4/line 10 Coordinate with PSNRP how and to what end? This coordination is important, but there needs to be more guidance here.

p. 4/line 28 There are principles for data sharing and exchange that could be brought to bear here, for example, the principle that all parties should be able to obtain data at equal cost.



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 18, 2011

Nathalie Hamel
Puget Sound Partnership
326 East D Street
Tacoma, WA 98421

Dear Nathalie,

Thank you for the opportunity to comment on the draft Charter for the Puget Sound Coordinated Ecosystem Monitoring and Assessment Program (Regional Monitoring Program) and recommendations for establishing the Regional Monitoring Program's Work Groups. The Department of Ecology (Ecology) supports the Charter, which provides a necessary framework for the incoming Steering Committee to move forward and build upon.


We offer the following general comments to strengthen and underscore the Charter's service as a tool to successfully launch a Regional Monitoring Program that has broad support and stakeholder buy-in.

- Ensure the new regional monitoring framework sustains the value of existing monitoring programs (e.g., locally-driven priorities, clean-ups, compliance monitoring, etc.).
- Ensure that existing "clients" remain engaged in the Regional Monitoring Program framework, can clearly see the value and connection of their efforts to the Regional Monitoring Program, and will benefit from voluntary participation in the Regional Monitoring Program.
- Ensure that the role of the Steering Committee is strong:
 - As an early next step, the Regional Monitoring Program should adopt bylaws that maintain open, inclusive, and transparent decision-making processes.
 - The Puget Sound Partnership (Partnership) should follow the Puget Sound Monitoring Consortium's recommendations for forming the steering committee and ask stakeholders to nominate their representatives, envisioned to be managers and high-level scientists directly involved in monitoring and assessment.
 - Balance the desire to be broadly inclusive with the practical need to keep the committee small enough that it can be effective: 15 members pushes that envelope.
- The roles of the Leadership Council, Science Panel, and Ecosystem Coordination Board should be practical and at a high level. Ecology encourages the launch committee to shift more authority to the Steering Committee, and to use the Partnership's leadership boards in a manner more consistent with their current functions and modes of operation.
- The Steering Committee should oversee and direct the Regional Monitoring Program's staff housed at the Partnership.

- Ecology supports the stated approach to initiate a small number of work groups to build on existing efforts, prioritize future work, to create tangible monitoring outputs and help inform the structure of the long-term regional framework. We encourage the Regional Monitoring Program to move forward with small adaptations of key programs/efforts that are currently functioning and expand and continue to adapt as opportunities arise to build upon early successes.
 - We encourage pilot testing the proposed Regional Monitoring Program structure with just a few, already-existing groups to provide a solid basis from which to expand and perhaps reorganize within a more comprehensive framework in the future. Ecology appreciates the difficulty of describing a single comprehensive framework and encourages the launch committee to recommend allowing flexibility for the framework to develop over time. Ecology program staff will be available to support the following existing programs that we see as strategic, initial work groups to integrate into the new regional monitoring program structure. This integration should include various degrees of re-organization and re-prioritization of focus.
 1. **Stormwater** based on the existing work group.
 2. **Marine Water and Sediment Quality** including Puget Sound Assessment and Monitoring Program (PSAMP) components and other efforts.
 3. **Marine Shoreline and Nearshore Habitats** including PSAMP components and related efforts.
 4. **Salmon** based on the existing recovery monitoring effort.
 5. **Toxics** expanding the scope, structure, and participation of the current Toxics Loading Steering Committee.
 - Coordinating data management is critical to the success of the entire effort.
 - Coordinating modeling efforts also will help the Regional Monitoring Program succeed.
- Ecology supports the concept of conducting independent third party review of the effectiveness of the regional monitoring program at appropriate intervals.

Thank you again for the opportunity to comment and for providing Ecology with the opportunity to participate in developing and establishing the Regional Monitoring Program. Ecology will continue to support the overall effort, including work groups to which our staff can contribute. Please feel free to contact Rob Duff at 360.407.6699 or Karen Dinicola at 360.407.6550 if you have questions about these comments.

Sincerely,



Josh Baldi
Special Assistant to the Director

cc: Rob Duff, Environmental Assessment Program Director
Karen Dinicola, Stormwater Work Group Project Manager

From Doug Meyers, People for Puget Sound

Comments on Monitoring Charter

General Comments – The Charter is only slightly more developed than earlier attempts such as PSAMP and PS/GB but a decent start. Not clear how monitoring data gaps will be identified. Just assigning the task to a work group or two doesn't make clear what those groups' jobs will be. This step is hard which is why it hasn't been done before. If anybody is currently vested in a monitoring program within state government, they seem to fail to identify data gaps other than those that support continued or expanded funding for their own programs. The Science panel needs to do this independently as a synthesis of Puget Sound Health documents of the past and emerging needs for data that nobody has collected yet. Specifically, food web models point to giant missing components that are often just estimated from the literature rather than based on any empirical data collection.

Very little funding exists currently for the kind of effectiveness monitoring we are looking for within the existing restoration, recovery or clean-up programs so if we need that data, we will need supplemental funding that is focused on a few programs with high impact (In PSNERP, we called them actions with a high signal to noise ratio). For example, estuarine restoration monitoring from the Nisqually and some of the larger Skagit restoration projects will produce a large signal in a number of measurable parameters like sediment transport, tidal channel formation, intertidal vegetation growth, invertebrate production, etc. that can be surrogates for larger landscape scale responses like juvenile salmon support. The measured attributes of those projects can be further inferred to have a larger response across the Sound as they are used in ratio and proportion math to the total acreage of estuarine restoration over x number of years.

Other parameters, like effectiveness of toxic clean-ups might need to come from long term data sets and monitoring required under Superfund or MTCA. I'm still concerned the water quality index will teach us nothing and should be scrapped in favor of a more targeted approach such as TMDL parameters where they exist.

Specific comments -

P. 12 – line 38 – Who is “the Academy?” -Not named or defined anywhere else in the document. Looks like it may have been cut and pasted from something in the Science Panel charter about WA Academy of Science. Reference should be removed unless the WA Academy of Science is expected to have some formal role in this peer review process.

P. 13 – Funding strategy – There should be some acknowledgement of the mechanism of contractual arrangements and the exchange of funds to assure data quality control and reporting requirements are met as opposed to piecing together a monitoring system from those agencies and organizations that are required to contribute as a proviso to their agency science funding and those who participate without compensation. Outside the government sector, a survey of available data or data collecting capabilities in the form of an RFQQ specifically designed to fill identified data gaps should go out to determine the universe of likely players and the potential cost to sustain data collection and reporting from the non-governmental sector.

Comment on Work Groups

Concern over the potential for “stovepiping” within work groups. Don’t understand why there needs to be a salmonid work group since all of the habitat actions are being monitored from within other work groups. If the Action Agenda is going to tackle harvest or hatchery reform to make NMFS accountable, then that work group should focus on those specific parameters. Otherwise, all of the habitat and water quality work groups will be too salmon-centric and a confusion of roles or potential power play between the salmonid work group in its “coordination” role and the other work groups could arise. (I speak from experience!!!)

Similarly, a data management work group seems superfluous. This role is better played by PSP staff and should be coordinated between the Steering Committee based on their need for understandable information and the various work groups and their ability to produce certain data.



The Coastal Watershed Institute (CWI)

13 January 2011

Nathalie Hamel
Monitoring Program Manager
Puget Sound Partnership
326 East D Street
Tacoma, WA 98421-1801

Comments on the Puget Sound Partnership draft Monitoring Charter follow. This input is offered with the sincere intent of a developing a final guidance document worthy of our critical Salish and coastal ecosystems. Please keep us posted on the progress of this important effort.

Sincere thanks,

Anne Shaffer
Executive Director

Review comments.

Coordinated monitoring is extremely critical for sound science and effective fiscal use of dwindling public agency resources. Local to cross regional coordination is fundamental to truly understand the ecosystem that we are collectively trying to protect, manage, and recover. There is both a temporal and scale element to this coordination, which needs to include links to past efforts that have served us well (PSAMP) and other excellent regional efforts including the West Coast Governor's Agreement, Actions, and Workplans (<http://www.westcoastoseas.gov/action/>) and relevant action plans), and the Sea Grant state and regional plans (<http://www.seagrant.noaa.gov/regional/index.html>, <http://seagrant.oregonstate.edu/research/RegionalPlanning/>). Please clarify in the how this Monitoring Charter builds on and compliments these efforts. A table with cross links would be useful.

Overall the goals and scope seem vague and inconsistent throughout the document. For example, the issues identified in the Problem Statement; *'In addition, no single monitoring program offers an ecosystem-wide view of the health of Puget Sound. Finally, monitoring activities need to be better coordinated across organizations and scales and findings made publicly available'* aren't referenced in the goal section. Goals stated in the Reporting section (*'To...motivate actions by many individuals and groups'*) are inaccurately attributed to the Monitoring Program instead of the managers it services, are also not stated in the Goals section. Please clarify up front exactly what the goals of the Monitoring Charter are, and specifically link to them throughout the document from beginning to end.

Please provide a timeline with the implementation of this Charter. Include a historic component that shows clear linkage to the PSAMP efforts over the last decade, and how (and how far) this Charter will take us into the future.

The proposed monitoring Charter organization appears way too top down and doesn't adequately address scale. While the Partnership and associated Science Teams and Leadership Counsels have an important perspective, much on the ground monitoring is occurring at the local scale and intended to answer specific local questions. These data are invaluable in that they give us very high resolution information. They can also be used to answer larger regional (and cross regional) questions. The priority of local monitoring therefore shouldn't be compromised or diminished for larger scale agendas. Instead coordination should occur so that local efforts may be cumulatively linked to identify and address regional and cross regional needs and information gaps. To accurately capture this intent the decision tree of Figure 2 should be lateral- not vertical- and with equal weight given to local and state wide authorities.

The proposed Monitoring Charter is way too process and committee laden. Our state natural resource efforts already suffer from way too many committees and meetings and way too little science on the ground. We face fiscal crisis for the foreseeable future. I would respectfully recommend dispensing with both the Steering and Coordination committees. Work groups can and should work directly with the Science Committee (a subcommittee of it if absolutely necessary) and the Leadership and Launch committees.

There is reference to the 'Academy' (page 12 line 38) that needs to either be clarified or corrected and the word deleted.

The Reporting section needs to include detail on how coordinated reporting and synthesizing is going to occur-not just 'Collect information of different formats' and then 'tell the story' to others. Top down 'story telling' without substantive local collaborative and coordinated input can lead to the dictating and damaging misdirecting local efforts that in fact should instead be driving larger regional direction.

The Funding section needs to include an efficiency statement that clearly states a dedication to strategic and efficient use of existing and ongoing monitoring resources, and utilizing current, long term, and local resources as cornerstones on which to address well stated and clearly focused goals.

Finally, there should be reference to other long term monitoring actions of Puget Sound, including the Puget Sound Research Conference that has played such an important role in effectively communicating science, monitoring efforts, and results over the last decade. We need to specifically call out this as an important monitoring coordination element, and rededicate ourselves to it.



January 19, 2011

Nathalie Hamel
Monitoring Program Manager
Puget Sound Partnership
326 East D Street
Tacoma, WA 98421-1801

RE: Nearshore Habitat Program Comments on Draft Charter of the Puget Sound Coordinated Ecosystem Monitoring and Assessment Program

Dear Nathalie:

The Washington State Department of Natural Resources (DNR) has reviewed the proposed changes and draft charter of the Puget Sound Coordinated Ecosystem Monitoring and Assessment Program. DNR appreciates the extensive review and analysis that was provided.

DNR is concerned that the issue of governance was not addressed in the draft charter. Our understanding is that this was the primary objective of the charter committee. In addition, the proposal fails to discuss whether and how a third party independent entity option would be considered. Settling this issue seems fundamental to building a workable charter for the program.

DNR does see some import benefits from independent governance, namely credibility of the data and process and more accountability overall in the monitoring system. However, if the charter proposed to address the role a third party independent entity would play in some other specific manner, it would certainly be open to consideration. Unfortunately, this proposal lacks that specificity.

Specific comments on the draft charter:

1. *Complexity of organizational structure.*

The proposed structure is more complex than Puget Sound Assessment and Monitoring Program (PSAMP), the pre-existing regional monitoring model. Two committees were used in PSAMP to coordinate the monitoring activities of groups housed in different agencies, one technical and one focused on management. This arrangement was considered by some to be not effective because the management committee did not have distinct responsibilities. Over the last two years or so, PSAMP has effectively combined these two committees into one.

The draft charter does not provide a compelling argument that a more complex structure will be effective. The proposed organizational structure is complex, with many related groups that have linked responsibilities. To maximize the chances of success under the proposed structure, a central group needs to be identified to integrate and 'drive' monitoring. The best candidate is the steering committee. This group should be mandated to interpret and act on

guidance from above and guide work by the workgroups (Leadership Council, Science Panel and Ecosystem Coordination Board). One option would be to combine the steering and coordination committees.

2. *Responsibilities need clarification.*

The successful functioning of the various committees will require very clear responsibilities and expectations.

- Which group has the final responsibility for redirecting resources to match any shift in monitoring priorities?
- The work groups at the bottom of the structure are given responsibility in the draft charter for providing accountability. This does not seem appropriate.
- The main challenge of a regional monitoring program is to provide analysis and synthesis that is relevant to pressing management issues. Synthetic analysis requires dedicated technical expertise. In the draft charter, Puget Sound Partnership staff will lead the effort to compile, analyze, and manage data and to produce and interpret results at the ecosystem level. Will the staff have the scientific resources to conduct this challenging analysis and interpretation?

3. The proposed work groups do not spearhead the major critical monitoring tasks that are facing Puget Sound Partnership today, namely further development of dashboard indicators, development of an expanded indicator list, target setting, and integration of monitoring data with the performance management system. These efforts are currently being addressed by separate groups and efforts within Puget Sound Partnership. These topics are central to the monitoring program, so they need to be central to its work effort, either as particular work groups or as clearly defined integrative projects among work groups.

Thank you for the opportunity to comment. We look forward to working with you and the charter committee to develop a workable solution to this important task.

Sincerely,



Naki Stevens
Executive Policy Advisor on Puget Sound

cc: Leadership Council
Science Panel
Ecosystem Coordination Board
Kristen Swenddal, Aquatics Division Manager



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NATIONAL HEALTH AND ENVIRONMENTAL EFFECTS
RESEARCH LABORATORY
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200 S.W. 35TH STREET, CORVALLIS, OR. 97333

OFFICE OF
RESEARCH AND DEVELOPMENT

DATE: January 13, 2011

SUBJECT: Puget Sound Partnership Monitoring

FROM: Anthony (Tony) R. Olsen
Environmental Statistician

TO: Nathalie Hamel
Monitoring Program Manager
Puget Sound Partnership
325 East D Street
Tacoma, WA 98421

Draft Charter

Overall the draft Charter outlines a reasonable approach to the development and implementation of a monitoring program for Puget Sound (including the watershed).

Does the draft Charter provide a foundation so that the Steering Committee, once formed, can begin developing a detailed work plan?

The charter does provide an adequate foundation.

Are there any significant gaps in the Purpose, Goals and Roles and Responsibilities sections?

The purpose identifies the four major areas. What is not clear is what will be monitored even in a general sense. One focus would be monitoring within the Puget Sound estuary, another would be streams and rivers of the Puget Sound watershed. Does it include Lake Washington and other lakes within the watershed? Does it include groundwater? What is the relationship to "Dashboard indicators"? Some are clearly envisioned to be included, while others are not.

Steering Committee, Coordinating Committee and Work Groups roles requires significant coordination among them. Both the Coordinating Committee and Work Groups are directly linked to the Steering Committee. When differences arise between individual Work Group perspectives and Coordinating Committee perspective, these differences will need to be resolved by the Steering Committee. Work Groups may perceive this as a way to bypass the Coordinating Committee when Work Group disagrees with Coordinating Committee recommendations. I don't recommend that the structure be changed but only that all groups must understand how the process will be implemented.

Are elements missing in the Charter that need to be added or addressed?

I am concerned that insufficient emphasis is given to clarity of monitoring objectives and tying

them to decision making. Building a monitoring program based on adding to/ combining existing monitoring programs is very cost-effective and sensible IF it doesn't result in a monitoring effort that is disconnected from PSP monitoring objectives.

Are there ambiguities in any of the sections that need to be clarified?

Problem statement does not include monitoring required by NPDES permittees or other regulatory monitoring requirements by business. It is critical that this monitoring be incorporated into the PS Monitoring Program. Although these entities are included later in the charter, they should appear in the problem statement.

Monitoring entities' role must include responsibility for using common protocols adopted by the Monitoring Program. The protocols include field procedures, lab procedures, and information management. Timeliness is also critical. These issues are at the core of a successful Monitoring program for Puget Sound. It row 6 of the table in the appendix, implication is that monitoring entities are only governmental. What is stated is not as comprehensive as it should be.

Peer Review: What "Academy"? (p12, l39). This sentence seems to be from some other source and not directly relevant.

Appendix 1 uses term "Technical Committee" instead of "Coordinating Committee"

Draft Work Groups

Are there missing criteria or have we included criteria that are not essential for identifying topics for Work Groups? What are your suggestions for improving the criteria?

Potential criterion is indicator that is used in scenario model of alternative futures.

Another criterion: know whether the work group is addressing implementation, compliance, effectiveness or status/trends monitoring.

Another criterion: addresses or is tied to one of the PSP action items.

Do you agree with the recommended topics for Work Groups?

Given that restoration requires tradeoffs in ecosystem service I would include monitoring for ecosystem services in marine, freshwater, forest, agriculture, and urban ecosystems.

What topics (those that are listed or others not included) need more urgent attention, and why?

No suggestions.

TO: Nathalie Hamel
FROM: Kit Paulsen, City of Bellevue
DATE: January 25, 2011
SUBJECT: Comments on the Puget Sound Coordinated Ecosystem Monitoring and Assessment Program Draft Charter and Recommendations for Topical Work Groups

Nathalie, we appreciate the extra time to review and comment on your draft materials, thank you. The Coordinated Ecosystem Monitoring and Assessment Program is a critical element for restoring Puget Sound and how the program is started will play a pivotal role in how well the program works. I look forward to seeing a regionally coordinated, integrated, functional and fiscally prudent monitoring program.

Draft Charter

The reader of this draft Charter should be able to easily identify the goals, structure, functional roles and responsibilities, and funding sources for the proposed Monitoring Program. Several staff members reviewed the draft Charter and could not do this because the information is either not clearly defined or is sprinkled throughout different sections of the charter. For example, the Reporting section (page 11) of the Charter contains the following statement.

“Key goals of the Monitoring Program are to inform decisions and motivate actions by many individuals and groups. To do this effectively, the Monitoring Program must help answer three types of questions. Is the ecological health of the Puget Sound Region getting better or worse? Are Action Agenda Near-term Actions being implemented and are those actions producing the desired outcomes? What additional monitoring and actions are needed?”

This statement seems like it would more appropriately be located in the monitoring program goals or principles section.

In general, the roles section is difficult to read and understand. It seemed that the committee probably continued working and developing concepts for the appendices and later sections that were not reflected in the earlier sections.

Monitoring in Puget Sound is complex and changing, with most people only aware of a portion of the work. Therefore, to keep a level playing field for the readers and provide clarity as noted above, it will be important to also explain references to other programs or documents, such as the Performance Management System (what it is, how it fits in scale and focus to the monitoring program, who will be doing the integration).

As you can imagine, funding will be a major concern for many entities. While I would recommend this document be focused on form and function, it seems important to say that the effort is designed, in part, to provide better information at lesser cost and that the various committees are charged with finding elegant monitoring solutions to achieve both objectives.

Purpose

The purpose statement does not seem to be consistent or fully clarify the intent of the program. In the second sentence, the purpose is to coordinate monitoring, but the following sentence states the program is to produce, synthesize and integrate results.

Does the Ecosystem Monitoring Program plan to conduct or commission any monitoring or merely to coordinate existing programs?

Is the Ecosystem Monitoring Program going to manage and analyze data (whether conducted themselves or by others) and synthesize data for reports? Should the reader differentiate between the Ecosystem Monitoring Program and the Partnership staff, given the roles and responsibilities sections?

Is the Ecosystem Monitoring Program going to be the fulcrum for science policy interface, where questions are more fully formed for use by the Partnership and stakeholders to focus actions or does the Science Panel conduct that work?

Having a clearly articulated purpose statement would allow everyone to better understand how the roles and responsibilities reflect the purpose statement. Overall, I suggest that the focus should be on the use of the monitoring first, with the continual improvement process for the monitoring program as a secondary focus. Otherwise, there is a tendency for scientists to continue to refine detection limits or other technical details even though the better information isn't needed to make decisions and take action.

Goals

Prior to the goals, it seems that you should articulate the over-arching principles for the program. Some of these seem reflected in the goals, but are embedded throughout the documents without being clearly stated. I would recommend you reflect back on the recommendations for "Mutual Interests" from the initial coordinated monitoring committee, pages 9-11 of the document, as they are likely similar (attached):

[Surface Water and Aquatic Habitat Monitoring Advisory Committee Report and Recommendations](#) (3/9/07)

I suggest that these principals would be the means to evaluate the Ecosystem Monitoring Program as it moves forward, while allowing the natural evolution to occur in tasks, objectives, and possibly even goals.

The goals are laudable and are all required to have a meaningful monitoring program. The first goal linking information to decision-making shows good focus, but the sub-elements should make stronger linkages to the usefulness and application of data to actions. The sub-elements seem more related to other goals, not on developing the structure necessary to make the data useful to decision-makers.

Questions related to scale are not well addressed and lead to confusion. What is the distinction between local programs and regional?

One of the key elements for the regional monitoring program is to focus efforts more efficiently and seek opportunities to reduce costs while improving resource management information. It will be crucial that the effort is sustainable, so must be fiscally prudent.

The goals seem more focused on internal monitoring program details, not on the linkages to actions and policy-makers. Does the adaptive management section merely relate to the improvement of monitoring?

Figure 2

How do the regulators, such as NOAA Fisheries or EPA, fit into this structure? For instance, there is no discussion of how the guidance for monitoring endangered species will fit into this regional structure. It seems in many instances that they could have the final authority on many of the monitoring elements.

Roles

The RACI concept is excellent and should be further refined. In the body of the text, there are multiple committees all tasked with the same charge, so there is little clarity on roles for the general reader. In particular, additional clarity on the independent roles of the Science Panel and Partnership staff compared to their supporting roles for the monitoring committees is needed. Also, the different monitoring committees that have synthesis and reporting roles have no supporting information to say the differences in their authority and responsibilities. Appendix 1 improves the overall understanding of these committees, but it does not seem well reflected in the body of the document.

There are a few places where the entity with responsibility may not have the authority to effect change. Responsibility and authority should always be linked.

There are only a few committees with the directive to seek funding. It seems like each committee will likely be looking for resources to achieve their mandates.

The language for applying the monitoring information is weak. For instance, the Ecosystem Coordination Board is “informed” and “consulted.” That is not a very strong linkage for the monitoring data that is to be used “to achieve the goals of the Action Agenda.”